

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Docket No. 2003-10370-DPW-05

\* \* \* \* \*  
UNITED STATES OF AMERICA \*  
\*  
V. \*  
\*  
JOHN MCCARTHY \*  
\* \* \* \* \*

**MOTION FOR TRAVEL PERMISSION**

Now comes the Defendant, John McCarthy, relative to the above captioned matter and respectfully requests that this Honorable Court grant the Defendant permission to travel and reside out of state temporarily for the month of January, February and March of 2005.

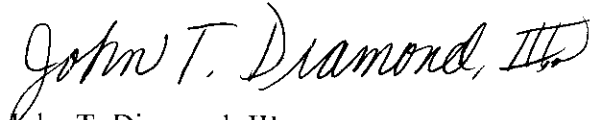
As reasons therefore:

The Defendant has lined up potential work in the Fort Myers area of Florida, specifically the defendant has lined up work at City of Palms Baseball Park, located in downtown Fort Myers. The Defendant has had a difficult time lining up steady employment in the Massachusetts area and the Fort Myers area presents more beneficial environment. As further reasons, the Defendant's mother resides in the Fort Myers area. The Defendant has temporarily secured residence at 1082 Southdale, Fort Myers, FL 33919. The Defendant has discussed this situation and request with his Pretrial Services supervisor, David Picozzi. Mr. Picozzi has been supportive of the Defendant's request and circumstances. The Defendant has been under the supervision of Pretrial Services since the inception of this case, having previously been supervised by Josh Ulrick. Mr. Picozzi has been supervising the Defendant since the beginning of November, 2004. The Defendant has been in full compliance with his pretrial conditions throughout the pendency of this case. Counsel for the Defendant has discussed this request with

Assistant United States Attorney, Rachel Hershfang, and she has stated that she is opposed to this request.

WHEREAS, for all of the above reasons, the Defendant, John McCarthy respectfully requests that this Honorable Court grant him permission to travel and temporarily reside outside of state in Fort Myers, Florida for January, February and March of 2005.

Respectfully Submitted  
JOHN MCCARTHY,  
By His Attorney,

A handwritten signature in black ink that reads "John T. Diamond, III". The signature is written in a cursive, flowing style.

John T. Diamond, III  
TORNEY, MAHONEY DIAMOND & BENNETT  
15 Foster Street  
Quincy, MA 02169  
BBO No: 555934  
Tel: (617) 770-0000


Date: 12/22/04

CERTIFICATE OF SERVICE

I, John T. Diamond, III, Esq., do hereby certify that a copy of the within:

I. Motion for Travel Permission

has been sent, via fax and in hand, to Assistant U.S. Attorney, Rachel Hershfang, U.S. Attorney's Office, One Courthouse Way, Boston, MA 02210 and via fax and in hand to Pretrial Services Officer, David Picozzi.

  
John T. Diamond, III  
TORNEY, MAHONEY, DIAMOND  
& BENNETT  
15 Foster Street  
Quincy, MA 02169  
BBO #555934  
(617) 770-0000

Dated: 12/22/04